



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 16, 2011

Dave Kaumheimer  
Environmental Program Manager  
Columbia-Cascades Area Office  
1917 Marsh Road  
Yakima, Washington 98901

Re: EPA comments on Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project. Project Number: 09-014-BOR.

Dear Mr. Kaumheimer:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) regarding the Cle Elum Dam Fish Passage Facilities and Fish Reintroduction Project (FP/FR) near Cle Elum, Washington. Our review was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS was prepared in cooperation between the Bureau of Reclamation (BOR) and the Washington Department of Ecology (DOE) to analyze the proposal to construct fish passage facilities at the Cle Elum Dam, Washington and to reintroduce fish species above the dam to restore ecological connectivity and natural production of anadromous fish. The FEIS identifies Alternative 3 as the Preferred Alternative- Right bank juvenile passage with right bank adult passage without barrier dam. The EIS did not identify a Preferred Alternative related to fish reintroduction. Our comments on the draft EIS expressed concerns with impacts to water quality and we recommended additional detail regarding components of the project's design, mitigation, fish reintroduction, and cumulative impacts.

We appreciate the responses to our comments and additional information regarding project design, permits/approvals, ESA consultation, and mitigation. In response to our request for additional information regarding water quality, the FEIS states that predictions and compliance with state water quality standards would be determined during the permitting process (FEIS CR-46). We appreciate the characterization of current water quality and commitment that waters would not be further degraded; however, because there is no detailed information regarding numerical or narrative predictions of potential impacts to water quality, we continue to have concerns. We support coordinating with Washington Department of Ecology and other relevant agencies to ensure that the approved permits include the necessary limitations and required mitigation to protect water quality.

We also raised concerns with the lack of information about the fish reintroduction aspect of the proposal and associated cumulative impacts. Thank you for your response explaining that this EIS serves as a programmatic level evaluation for the fish reintroduction and that further analysis will occur when a proposal is developed. We appreciate the references to supporting technical documents. These were helpful to understand how reintroduction could be implemented<sup>1</sup> and what the production potential of coho and sockeye could be. We recommend that the tiered NEPA analysis fully disclose the supporting information on the success of fish reintroduction and discuss the long-term viability of habitat quality to support species in the basin. We look forward to future analyses as this aspect of the proposal develops.

Thank you for the opportunity to provide comments on this FEIS. Please feel free to contact myself at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or contact Lynne McWhorter of my staff at (206) 553- 0205 or at [mcwhorter.lynne@epa.gov](mailto:mcwhorter.lynne@epa.gov) with any questions or to further discuss these comments.

Sincerely,



Christine B. Reichgott, Unit Manager  
Environmental Review and Sediment Management Unit

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<sup>1</sup> Bureau of Reclamation. 2005. Anadromous Fish Reintroduction Plan Storage Dam Fish Passage Study Yakima Project, Washington.